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Municipal Stormwater W. Washington Phase II
WA Department of Ecology
Water Quality Program
PO Box 47696
Olympia, WA 98504-7696

Department of Ecology
Water Quality Program
MAY 22 2006

Comment Reviewer(s),

This comment is to address the lack of monitoring requirements in the Western Washington NPDES Phase II Permit. Reviewing the minimum requirements, the NPDES General Fact Sheet, and discussion with Ecology staff during a permit workshop, it's clear that monitoring is not required. NPDES Phase II is the latest regulatory answer to meeting the goals of the Clean Water Act. The Clean Water Act, and RCW 90.48, both require the protection of surface water, using the best available technology, to reduce and eliminate pollution producing activities and sources. How can a municipality know if there's a surface water quality issue without sampling? The best way to sum up this comment is the following diagram; this diagram can be found at EPA's website:

<http://www.epa.gov/watertrain/cwa/bigpic.htm>. The diagram is titled the Clean Water Act Big Picture...



The yellow box, the second step in the flow chart after setting goals, is to conduct monitoring. None of Washington States regulatory efforts, like NPDES Phase II, have required monitoring surface water for pollutants or water quality constituents in WAC 173-201A. As aquatic ecosystems continue experiencing degradation, it's unfortunate that we still don't require monitoring. Without monitoring information, how will we understand the problems associated with specific waterways, or know the problem exists?



City of Redmond
WASHINGTON

Surface water monitoring needs to be a minimum requirement of the NPDES Phase II permit. Without making monitoring required, most cities will not be able to secure funding for sampling. Without sampling, it will be close to impossible to track sources of pollution with an Illicit Discharge Detection/Elimination program, one of the minimum requirements.

Without requiring monitoring, the goals of the Clean Water Act, and RCW 90.48, will never be realized. The Clean Water Act was created in 1972, it has been 34 years, and we still can't reach the second step of the aforementioned "CWA Big Picture."

Sincerely,

Andrew Rheaume
IDDE Program Coordinator
Natural Resources Division of Public Works
City of Redmond